

ATTACHMENT A

RESPONSE TO COMMENTS

Title V/Synthetic Minor Proposed No. V-03-020
NEWPORT STEEL CORPORATION
NEWPORT, KY.
November 13, 2003

Comments and Suggested Revisions on the Draft Title V/Synthetic Minor Permit submitted by Thomas L. Golatzki, Newport Steel Corporation.

Emission Point Number 8 (8" Pipe Coating):

1. Newport Steel (NPS) requests that the annual VOC emissions limitation and all testing, specific monitoring, specific recordkeeping, and specific reporting provisions that are based upon an annual VOC emission limitation be deleted from the permit as they appear to have no regulatory basis. Under Item 4, Specific Monitoring Requirements, NPS requests that the sentence "Newport Steel is required to monitor data from the manufacturer for each batch used" to be change to "Newport Steel is required to monitor data from the manufacturer for each shipment of clear coat received at the facility"

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source. Please note that Specific Record Keeping Requirements and Specific Reporting Requirements have been changed as appropriate for the circumstances (refer to page 5 of 37, items 5 and 6 of the permit).

Emission Point Number 9 (16" Pipe Coating):

2. Under Item 2, VOC emissions from this point are limited to 38.7 tons per any 12 consecutive month period. The regulations for avoiding the applicability of 401 KAR 51:017 would provide for a 40-ton annual emission limitation. NPS requests that the emission limitation be changed to 40 tons per year of VOCs.

Division's response: The Division discussed this matter with representative of NPS and in response on October 7, 2003, the source then submitted the following statement: "Newport Steel's mill pipe coating systems are not set up in a way that would easily allow daily records of usage to be kept for more stringent monitoring and recordkeeping as you have mentioned. Because of this, Newport Steel is willing to keep the emission limitation at 38.7 tons for the 16" Pipe Mill."

3. Under Item 4, Specific Monitoring Requirements, NPS requests that the sentence "Newport Steel is required to monitor data from the manufacturer for each batch used" to be change to "Newport Steel is required to monitor data from the manufacturer for each shipment of clear coat received at the facility"

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.

5. Under Item 5, Specific Recordkeeping Requirements, NPS requests that this provision be revised to allow the company to take into account the full amount of any clear coat recovered in calculating VOC emissions. NPS does not understand why a limit of 10% of the clear coat input is included as a restriction on the credit for VOCs that are recovered. If NPS is able to document recovery of more than 10% of the clear coat that is used, it should be allowed to take full credit for such recovery.

Division's response: The Division discussed this matter with representative of NPS and in response on October 30, 2003, the source then submitted the following statement:
" At the time of the original Title V Permit application, Newport Steel had a study completed that documented a 10% VOC control efficiency based on a material balance using coating applied and coating captured and disposed in drums. This kind of detail is not available on a regular basis, and therefore Newport Steel agrees to use the maximum of 10% for the VOC credit for recovered coating."

Emission Point Number 12 (Electric Arc Furnace):

6. As written, the draft Title V permit would require NPS to comply with both the daily melt shop visible emission monitoring and furnace free space monitoring in order to comply with 40 CFR Part 60, Subpart AAa. Because of the difficulty in maintaining devices to monitor furnace static pressure, the steel industry petitioned EPA to allow daily visible emission observations as an alternative to furnace static pressure monitoring for furnaces with DEC systems. See 64 Fed. Reg. At 10106 (March 2, 1999). NPS intends to comply with the NSPS through the daily shop opacity observation alternative. Accordingly, NPS requests that all provisions of the draft permit that would require monitoring of pressure in the free space inside the EAF, control system fan amperage, and damper positions, be deleted from the testing, monitoring, recordkeeping, and reporting provisions of the permit.

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source, but added the requirement (Under Item 1) that the owner or operator shall notify the Division and U.S.EPA, upon initial start-up of EAF. A correction was also made under the Applicable Regulations. 401 KAR 60:005 Section 3 (1) (dd) was changed to 401 KAR 60:005 Section 3 (1) (ii).

Group Requirements 1:

By final order entered February 18, 2000, the Secretary of the Cabinet in Newport Steel Corporation v. NREPC, File No. DAQ-24117-043, adopted as a final order of the Cabinet the "Agreed Resolution and Stipulation of Partial Issues" between NPS and the Cabinet. Pages 11 of 29 through 16 of 29 of the Agreed Resolution establish the agreed upon and adopted terms and conditions that were to apply to the Group Requirement 1 emission points. Although NPS recognizes that provision relating to the reheat furnace should be deleted from these provisions, as has been done in the draft permit, all other aspects of Group Requirements 1 from the stipulated permit and final order of Secretary should be incorporated into the final permit. Although most of the language in the draft permit mirrors that in the "Agreed Resolution", there are several deviations which have been identified on the attached mark-up. Pursuant to the Final Order of the

Cabinet, entered February 18, 2000, the identified language of the Agreed Resolution should be incorporated into the final Title V permit.

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source. Please note that upon review of this comment, the Division has made additional corrections to Section F (Monitoring, Record Keeping, and Reporting Requirements), page 30 of 37, Under Item 8 of the permit.